

Cause No. 13-19-00486-CV

IN THE THIRTEENTH COURT OF APPEALS OF TEXAS
CORPUS CHRISTI-EDINBURG
FILED IN
3rd COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS

11/3/2020 3:38:50 PM

MSW CORPUS CHRISTI LANDFILL, LTD.
Appellant/Cross Appellee

KATHY S. MILLS
Clerk

VS.

GULLEY-HURST L.L.C.
Appellee/Cross-Appellant

Appeal from 117th District Court, Nueces County, Texas

**JOINT MOTION FOR EXTENSIONS OF TIME TO FILE
RESPONSE AND REPLY BRIEFS**

TO THE HONORABLE THIRTEENTH COURT OF APPEALS:

MSW Corpus Christi Landfill, Ltd. (“MSW”) and Gulley-Hurst L.L.C. (“Gulley-Hurst”) file this Joint Motion for Extensions of Time to File Response and Reply Briefs and would respectfully show as follows:

Both MSW and Gulley-Hurst have filed notices of appeal and filed Appellant’s Briefs on October 16, 2020. The Clerk’s Record exceeds 3,200 pages, and the Reporter’s Record is 26 volumes. MSW’s Appellant’s Brief exceeded 22,000 words in length for which approval has been granted by this honorable Court.

The original due date for the respective Appellee’s Briefs is November 16,

2020, and the due date for the respective Reply Briefs would be December 5, 2020.

The undersigned counsel for both parties will be unable, for multiple professional and personal reasons, in light of the expansive record, to prepare their respective Appellee's Briefs and Reply Briefs in time to meet the original deadlines and request approval of the following deadlines:

Appellee's Briefs to be due December 16, 2020.

Reply Briefs to be due January 20, 2021.

PRAYER

MSW Corpus Christi Landfill, Ltd. and Gulley-Hurst L.L.C. pray the Court to grant this joint motion for extensions of time to file their respective Appellee's Briefs on December 16, 2020, and their respective Reply Briefs on January 20, 2021.

Respectfully submitted,

/s/ Audrey Mullert Vicknair

Audrey Mullert Vicknair

State Bar No. 14650500

LAW OFFICE OF AUDREY MULLERT
VICKNAIR

802 N. Carancahua Ste. 2100

Corpus Christi, Texas 78401

(361) 884-5400; (361) 884-5401 fax

avicknair@vicknairlaw.com

Attorney for MSW Corpus Christi Landfill, Ltd.

/s/ John D. Bell

John D. Bell

State Bar No. 02078900

WOOD, BOYKIN & WOLTER

615 N. Upper Broadway, Suite 1100

Corpus Christi, Texas 78401
(361) 888-9201; (361) 888-8353 fax
jdbell@wbwpc.com

Attorney for Gulley-Hurst L.L.C.

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Veronica Salais on behalf of John Bell
Bar No. 02078900
veronica@wbwpc.com
Envelope ID: 47779156
Status as of 11/3/2020 4:00 PM CST

Associated Case Party: MSW Corpus Christi Landfill, Ltd.

Name	BarNumber	Email	TimestampSubmitted	Status
Patrick James Carew	24031919	pcarew@kilpatricktownsend.com	11/3/2020 3:38:50 PM	SENT
Audrey Vicknair	14650500	avicknair@vicknairlaw.com	11/3/2020 3:38:50 PM	SENT
Monica Bohuslav	24074250	mbohuslav@maryelaw.com	11/3/2020 3:38:50 PM	SENT

Associated Case Party: Gulley-Hurst, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
John David Bell	2078900	jdbell@wbwpc.com	11/3/2020 3:38:50 PM	SENT
Douglas A. Allison	1083500	doug@dallisonlaw.com	11/3/2020 3:38:50 PM	SENT